



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 1, 2024

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

APPLICATION GRANTED

SO ORDERED *Vernon S. Broderick*

VERNON S. BRODERICK

U.S.D.J. 11/4/2024

Re: Muslim American Society of Queens, et al., v. U.S. Citizenship and Immigration Services, et al., No. 23 Civ. 2867 (VSB)

Dear Judge Broderick:

This Office represents the government in this action, in which plaintiffs seek judicial review of the denials by U.S. Citizenship and Immigration Services (“USCIS”) of two Forms I-129, Petitions for a Nonimmigrant Worker, that plaintiff Muslim American Society of Queens filed on behalf of plaintiff Akram Abdelsattar Hassanin Kassab. I write respectfully to request a further 10-day extension of the government’s deadline to file its motion for summary judgment (i.e., from November 5, 2024, to November 15, 2024). After discussion with plaintiffs’ counsel, I further request extensions of the parties’ remaining briefing deadlines set out in this Court’s order (ECF No. 29). The new proposed briefing schedule would be:

- The government’s motion for summary judgment due by November 15, 2024;
- Plaintiffs’ opposition and any cross-motion for summary judgment or motion for additional discovery due by January 6, 2025;
- The government’s reply and any opposition to plaintiffs’ additional motions due by February 3, 2025; and
- Plaintiffs’ reply to the government’s opposition due by February 24, 2025.

Pursuant to this Court’s order (ECF No. 23), on August 16, 2024, the government filed the certified administrative records of USCIS’s decisions on the Forms I-129 that plaintiffs are challenging in this case. ECF Nos. 24, 25. This Court then granted the government’s previous two requests for extensions to file its motion for summary judgment and extensions of the remaining briefing deadlines. ECF Nos. 27, 29. Unfortunately, tomorrow I am traveling to attend the funeral of a family member who recently passed away. I will be out of the office for several days and unable to finalize the government’s motion papers by the current deadline. The government respectfully requests another brief extension of its deadline to file a motion for summary judgment so that, upon my return, I may adequately confer with USCIS and finalize the government’s papers in support of its motion. This is the government’s third request for an extension of its deadline to file its motion for summary judgment and for extensions of the remaining briefing deadlines, and plaintiffs consent to this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

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cc: Counsel of record (via ECF)